

My name is James Bell Jr. I am the Editor of The Communications Technology Review [www.commtechreview.net], and I am an FCC-licensed Amateur Radio Operator [K7FTP, Extra Class]. I wish to comment on your BPL NOI.

While I do think there are applications for this technology, I believe that the implementation must be carefully monitored, and that the FCC should actively enforce Amateur [HAM] Radio as the LICENSED user of much of this spectrum.

Powerlines are already a major source of interference to radio communications. In the Provo, Utah area there are several areas where existing powerlines cause severe interference to mobile reception of local broadcast AM radio. 900 East from BYU to the Provo LDS temple is a very bad area.

Placing yet additional modulations on these overhead wires has the potential to cause severe harm to the HF portion of the HAM Radio spectrum. It will also impact the VHF portion of the spectrum. Over time, I would expect the utility companies to want more of the spectrum.

In response to this, I would ask the FCC to look over the number of times it has had to step in and force utility companies to resolve interference problems. The utility companies do not have a track record of self-policing or self-control. They do not normally work with local HAM's or other individuals to resolve issues. They instead wait for the FCC to come tell them to resolve problems. Check your own records. The data is there.

Without careful monitoring, the utility companies will cause severe interference, and then wait for the FCC to tell them to stop before resolving problems. In the meantime, the LICENSED users of this spectrum will suffer in both recreation and in emergency duties.

As the FCC and the federal government have recognized HAM Radio as an important part of homeland security, can we afford to have this radio service impacted by BPL? What if the service is needed in a given area, but it is being interfered with by BPL? Will the FCC step in immediately and make the utility take their system off-line within minutes, when minutes count? Does the FCC have the resources to do that? I do not believe so.

Our local ARES group - working with the Utah County Sheriff - performs many duties throughout the year. These include search-and-rescue operations which are both mountain and urban, assists with searches for fugitives, and performs other duties considered very important by local authorities.

Anything which would cause interference to these operations could cost lives.

In addition, BPL has the potential to dramatically reduce the enjoyment value of the HF spectrum. The ability to speak with radio operators in other countries goes a long way to creating international goodwill. The world needs more of that right now, not less.

For those in the FCC who are reading this comment and are not HAM radio operators, I would ask you to take a few minutes and find out more about it. It is both a valuable national resource in the field of homeland defense, and a great recreational and international goodwill tool.

You have many HAM's in the FCC, including Riley Hollingsworth, who can tell you about this service and tell you how the interference from BPL can seriously impact HAM radio. I suspect Mr. Hollingsworth could also provide documentation on the already existing cases of utility interference.

I thank you for your time and attention in reading this.

James Bell Jr.
Editor
THE COMMUNICATIONS TECHNOLOGY REVIEW
Provo, UT 84604